

1 TREVOR J. HATFIELD, ESQ.
Nevada Bar No. 7373
2 **HATFIELD & ASSOCIATES, LTD.**
703 South Eighth Street
3 Las Vegas, Nevada 89101
4 (702) 388-4469 Tel.
(702) 386-9825 Fax
5 thatfield@hatfieldlawassociates.com

6 *Attorney for Plaintiff*

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 RAQUEL JACOBS, an individual,

11 Plaintiff,

12 vs.

13 HOTEL NEVADA AND GAMBLING HALL,
LTD., a Domestic Limited Liability Company;
14 DOES I through X, inclusive; ROE
CORPORATIONS I through X, inclusive,

15 Defendants.
16

CASE NO: 2:17-cv-02517-JAD-PAL

**STIPULATION AND
ORDER TO EXTEND TIME TO
RESPOND TO DEFENDANT'S
MOTION TO DISMISS
(First Request)**

17 COMES NOW, Plaintiff RAQUEL JACOBS (hereinafter, "Plaintiff"), by and through her
18 counsel, Trevor J. Hatfield, Esq., of the law firm of Hatfield & Associates, Ltd., and Defendant
19 HOTEL NEVADA AND GAMBLING HALL, LTD. (hereinafter "Defendant"), by and through its
20 counsel, Whitney L. Welch-Kirmse, Esq., of the law firm of Greenberg Traurig, LLP, and do hereby
21 stipulate and agree to an extension of time for Plaintiff to respond to Defendant's Motion to Dismiss
22 (ECF #13). Accordingly, Plaintiff shall have up to and including April 20, 2018 to respond to
23 Defendant's Motion to Dismiss (ECF #13. This is the parties first request.

24
25 Plaintiff's response to Defendant's Motion to Dismiss is currently due March 30, 2018.
26 Plaintiff's counsel requests the extension due to conflicts in his work schedule and he will be out of
27 the country on a scheduled family vacation from March 23, 2018, through April 10, 2018.
28

1 This request is submitted pursuant to LR IA 6-1, 6-2 and LR II 7-1 and 26-4 and is the
2 parties' first request for an extension concerning an extension of the time for Plaintiff to respond to
3 a dispositive motions deadline.

4 Dated: March 19, 2018

Dated: March 19, 2018

5 HATFIELD & ASSOCIATES, LTD.

GREENBERG TRAURIG, LLP

6
7 */s/ Trevor J. Hatfield*

/s/ Whitney L. Welch-Kirmse

8 Trevor J. Hatfield, Esq.
9 Nevada Bar No. 7373
703 S. Eighth St.
10 Las Vegas, NV 89101
Tel.: (702) 388-4469
11 Fax: (702) 386-9825
Email: thatfield@hatfieldlawassociates.com
12 *Attorney for Plaintiff*

Mark E. Ferrario, Esq.
Nevada Bar No. 1625
Whitney L. Welch-Kirmse, Esq.
Nevada Bar No. 12129
3773 Howard Hughes Parkway, #400 North
Las Vegas, NV 89169
Tel.: (702) 792-3773
Fax: (702) 792-9002
Email: ferrariom@gt.aw.com
welchkirmsew@gtlaw.com
13
14 *Attorneys for Defendant*

15
16
17 **IT IS SO ORDERED.**

18
19
20 
UNITED STATES DISTRICT JUDGE

21
22 DATED: 3/20/2018.